

BOARD FOR PROFESSIONAL ENGINEERS
AND LAND SURVEYORS
Department of Consumer Affairs
State of California

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7 *Attorneys for Complainant*

8 **BEFORE THE**
BOARD FOR PROFESSIONAL ENGINEERS AND LAND SURVEYORS
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 892-A

12 **ALLAN JAY FAHRI**
13 **668 West Polson Avenue**
Clovis, CA 93612

14 **Civil Engineer License No. C 23687**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 Respondent.

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 **PARTIES**

20 1. David E. Brown (Complainant) is the Executive Officer of the Board for Professional
21 Engineers and Land Surveyors. He brought this action solely in his official capacity and is
22 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
23 by Kent D. Harris, Deputy Attorney General.

24 2. Allan Jay Fahri (Respondent) is representing himself in this proceeding and has
25 chosen not to exercise his right to be represented by counsel.

26 3. On or about June 12, 1974, the Board for Professional Engineers and Land Surveyors
27 issued Civil Engineer License No. C 23687 to Allan Jay Fahri (Respondent). The license was in
28

1 full force and effect at all times relevant to the charges brought in Accusation No. 892-A and will
2 expire on December 31, 2011, unless renewed.

3 JURISDICTION

4 4. Accusation No. 892-A was filed before the Board for Professional Engineers and
5 Land Surveyors (Board) , Department of Consumer Affairs, and is currently pending against
6 Respondent. The Accusation and all other statutorily required documents were properly served
7 on Respondent on March 24, 2010. Respondent timely filed his Notice of Defense contesting the
8 Accusation. A copy of Accusation No. 892-A is attached as exhibit A and incorporated herein by
9 reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, and understands the charges and allegations in
12 Accusation No. 892-A. Respondent also has carefully read, and understands the effects of this
13 Stipulated Surrender of License and Order.

14 6. Respondent is fully aware of his legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
16 his own expense; the right to confront and cross-examine the witnesses against him; the right to
17 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
18 the attendance of witnesses and the production of documents; the right to reconsideration and
19 court review of an adverse decision; and all other rights accorded by the California
20 Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 892-A, agrees that cause exists for discipline and hereby surrenders his Civil Engineer
26 License No. C 23687 for the Board's formal acceptance.

27 9. Respondent understands that by signing this stipulation he enables the Board to issue an
28 order accepting the surrender of his Civil Engineer License without further process.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board for Professional Engineers and Land Surveyors. Respondent understands and agrees that counsel for Complainant and the staff of the Board for Professional Engineers and Land Surveyors may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that electronic or facsimile copies of this Stipulated Surrender of License and Order, including electronic or facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the (Board) may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Civil Engineer License No. C 23687, issued to Respondent Allan Jay Fahri, is surrendered and accepted by the Board for Professional Engineers and Land Surveyors.

14. The surrender of Respondent's Civil Engineer License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

15. Respondent shall lose all rights and privileges as a Civil Engineer in California as of the effective date of the Board's Decision and Order.

16. Respondent shall cause to be delivered to the Board both his wall license certificate and, if one was issued, pocket license on or before the effective date of the Decision and Order.

17. Respondent agrees and the Board orders that he shall not petition for reinstatement of the surrendered license. Respondent agrees and the Board orders that he shall not apply for any license issued by the Board for three (3) years from the effective date of this surrender. Should respondent ever apply for any license issued by the Board, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for licensure in effect at the time the application is filed, including but not limited to submitting a completed application and the requisite fee and taking and passing the required examination(s), and all of the charges and allegations contained in Accusation No. 892-A shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application.

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DATED: 05 APRIL 2010 Original Signed
ALLAN JAY FAHRI
Respondent

11 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
12 for consideration by the Board for Professional Engineers and Land Surveyors of the Department
13 of Consumer Affairs.

5/8/10

EDMUND G. BROWN JR.
Attorney General of California
JANICE K. LACHMAN
Supervising Deputy Attorney General

KENT D. HARRIS
Deputy Attorney General
Attorneys for Complainant

5

Exhibit A

Accusation No. 892-A

1 EDMUND G. BROWN JR.
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11 In the Matter of the Accusation Against:

Case No. 892-A

12 **ALLAN JAY FAHRI**
13 **668 West Polson Avenue**
Clovis, CA 93612

A C C U S A T I O N

14 **Civil Engineer License No. C 23687**

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. David E. Brown (Complainant) brings this Accusation solely in his official capacity
20 as the Executive Officer of the Board for Professional Engineers and Land Surveyors,
21 Department of Consumer Affairs.

22 2. On or about June 12, 1974, the Board for Professional Engineers and Land Surveyors
23 issued Civil Engineer License Number C 23687 to Allan Jay Fahri (Respondent). The Civil
24 Engineer License was in full force and effect at all times relevant to the charges brought herein
25 and will expire on December 31, 2011, unless renewed.
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27
28

JURISDICTION

3. This Accusation is brought before the Board for Professional Engineers and Land Surveyors (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 6775 of the Code states, in pertinent part, that "[T]he board may reprove, suspend for a period not to exceed two years, or revoke the certificate of any professional engineer registered under this chapter:

...

"(b) Who has been found guilty by the board of any deceit, misrepresentation, or fraud in his or her practice.

"(c) Who has been found guilty by the board of negligence or incompetence in his or her practice.

"(d) Who has been found guilty by the board of any breach or violation of a contract to provide professional engineering services.

...

"(f) Who aids or abets any person in the violation of any provision of this chapter.

...

"(h) Who violates any provision of this chapter."

5. Section 6749 states in pertinent part:

"a) A professional engineer shall use a written contract when contracting to provide professional engineering services to a client pursuant to this chapter. The written contract shall be executed by the professional engineer and the client, or his or her representative, prior to the professional engineer commencing work, unless the client knowingly states in writing that work may be commenced before the contract is executed."

6. Section 8780 states in pertinent part:

The board may receive and investigate complaints against licensed land surveyors and registered civil engineers, and make findings thereon.

1 By a majority vote, the board may reprove, suspend for a period not to exceed two years, or
2 revoke the license or certificate of any licensed land surveyor or registered civil engineer,
3 respectively, licensed under this chapter or registered under the provisions of Chapter 7
4 (commencing with Section 6700), whom it finds to be guilty of:

5 (a) Any fraud, deceit, or misrepresentation in his or her practice of land surveying.

6 (b) Any negligence or incompetence in his or her practice of land surveying.

7 ...

8 (d) Any violation of any provision of this chapter or of any other law relating to or
9 involving the practice of land surveying.

10 ...

11 (g) A breach or violation of a contract to provide land surveying services.

12 (h) A violation in the course of the practice of land surveying of a rule or regulation of
13 unprofessional conduct adopted by the board.”

14 7. Section 8759 states in pertinent part:

15 “(a) A licensed land surveyor or registered civil engineer authorized to practice land
16 surveying shall use a written contract when contracting to provide professional services to a client
17 pursuant to this chapter. The written contract shall be executed by the licensed land surveyor or
18 registered civil engineer and the client, or his or her representative, prior to the licensed land
19 surveyor or registered civil engineer commencing work, unless the client knowingly states in
20 writing that work may be commenced before the contract is executed.”

21 8. Section 8762 states in pertinent part:

22 (a) Except as provided in subdivision (b), after making a field survey in conformity with the
23 practice of land surveying, the licensed surveyor or licensed civil engineer may file with the
24 county surveyor in the county in which the field survey was made, a record of the survey.

25 (b) Notwithstanding subdivision (a), after making a field survey in conformity with the
26 practice of land surveying, the licensed land surveyor or licensed civil engineer shall file with the
27 county surveyor in the county in which the field survey was made a record of the survey relating
28 to land boundaries or property lines, if the field survey discloses any of the following:

1 ...

2 (3) Evidence that, by reasonable analysis, might result in materially alternate positions of
3 lines or points, shown on any subdivision map, official map, or record of survey previously
4 recorded or filed in the office of the county recorder or the county surveying department, or any
5 map or survey record maintained by the Bureau of Land Management of the United States.”

6 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
7 administrative law judge to direct a licentiate found to have committed a violation or violations of
8 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
9 enforcement of the case.

10 **BECKER COMPLAINT**

11 10. On or about May 23, 2002 Ms. DJ Becker entered into a contract with Engineering
12 Specialties Co. (the “company”) (of which respondent is 50% owner) for a field survey to locate
13 existing property corners at 386 Valley Lake Ranchos in Madera County California for the sum of
14 \$550.00, which was paid in advance. The individual she had contact with was “Sonny” Elmo
15 Romias, an unlicensed individual, allegedly under the direct professional supervision of
16 respondent. Romias also claimed to be a 25% owner of the company. Ms. Becker never met or
17 saw respondent at the project site. Ms. Becker believed that Romias was a licensed land Surveyor
18 because he gave her respondent’s license number. During the project, Romias located several
19 points which were materially different from the actual points. Neither Romias nor respondent
20 filed a record of survey.

21 **FIRST CAUSE FOR DISCIPLINE**

22 **(Failure to Execute Written Contract)**

23 11. Respondent is subject to disciplinary action under sections 6749 and 8780(d)/ 8759 of
24 the Code in that he failed to provide a sufficient written contract for the Becker project.

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Failure to file Record of Survey as required by Law)**

3 12. Respondent is subject to disciplinary action under sections 8762(b)(3) of the Code, in
4 that after finding that there were material discrepancies in the lot lines of the subdivision, he
5 failed to file a new record of survey for the Becker project.

6 **THIRD CAUSE FOR DISCIPLINE**

7 **(Aiding and Abetting Unlicensed Practice)**

8 13. Respondent is subject to disciplinary action under section 6775(f) of the Code in that
9 he aided and abetted Romias in the unlicensed practice of Land Surveying on the Becker project.

10 **FOURTH CAUSE FOR DISCIPLINE**

11 **(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)**

12 14. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that
13 he was negligent and/or incompetent in his supervision of Romias on the Becker project.

14
15 **SMITH COMPLAINT**

16 15. On or about October 14, 2001 Mr. Richard Smith contracted with Engineering
17 Specialties Co./ Elmo "Sonny" Romias for a lot split/parcel map on property in Madera
18 California. The contract price was \$2,200.00. Between the contract date and August 17, 2002
19 Romias submitted the parcel map six times to Madera County with respondent's signature and
20 seal. Each time the map was rejected. Mr. Smith paid Engineering Specialties a total of \$1,700.
21 Mr. Smith never met or saw respondent at the project site. Mr. Smith terminated Engineering
22 Specialties on August 17, 2002 and completed the project with another surveyor.

23 **FIFTH CAUSE FOR DISCIPLINE**

24 **(Failure to Execute Written Contract)**

25 16. Respondent is subject to disciplinary action under sections 6749 and 8780(d)/ 8759 of
26 the Code in that he failed to provide a sufficient written contract for the Smith project.

1 **SIXTH CAUSE FOR DISCIPLINE**

2 **(Aiding and Abetting Unlicensed Practice)**

3 17. Respondent is subject to disciplinary action under section 6775(f) of the Code in that
4 he aided and abetted Romias in the unlicensed practice of Land Surveying on the Smith project.

5 **SEVENTH CAUSE FOR DISCIPLINE**

6 **(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)**

7 18. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that
8 he was negligent and/or incompetent in his supervision of Romias on the Smith project.

9 19. Respondent is further subject to disciplinary action under section 6775(c) and 8780(b)
10 in that he was negligent and/or incompetent in his submission of the parcel maps for the Smith
11 project under his signature and seal to Madera County, which the County rejected at least six (6)
12 times.

13 **GRAHAM COMPLAINT**

14 20. On April 24th 2003, Thomas Graham of the Madera County Engineering and General
15 Services Office submitted to the Board a Record of Survey and related documents previously
16 submitted by respondent to Madera County. The record of survey was for Jefferson Road and
17 Road 5 in Madera County (ROS 2001-29). Mr. Graham alleged that the repeated submissions
18 and returns for corrections submissions of ROS 2001-29 demonstrated negligence and/or
19 incompetence by respondent.

20 **EIGHTH CAUSE FOR DISCIPLINE**

21 **(Filing of a Record of Survey without having conducted a Survey)**

22 21. Respondent is subject to disciplinary action under section 8762(a) in that his
23 submission of ROS 2001-29 on 7/30/01 was made before the survey was completed on 11/20/01.
24 Therefore the first submittal must have been based on record information, not a survey as
25 required.

1
2 **NINTH CAUSE FOR DISCIPLINE**

3 **(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)**

4 22. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that
5 he was negligent and/or incompetent in his submissions of ROS 2001-29 in that it required
6 multiple and repeated corrections.

7 **TREMAINE AVENUE PROJECT**

8 23. On February 25, 2004, Thomas Graham of Madera County Resource Management
9 Agency made a complaint to the Board that rebar caps were located at the project site on Tremain
10 Avenue, Madera, California, (APN 032-761-016) with altered/incorrect numbers.

11 **TENTH CAUSE FOR DISCIPLINE**

12 **(Failure to Mark Monument with Proper Certificate Number)**

13 24. Respondent is subject to disciplinary action under section 8772 in that he failed to
14 mark the monuments at the Tremain Avenue project as required by law. They were marked as
15 "PE 83687", when they should have been marked as "R.C.E. 23687".

16 **26295 CULLEN WAY, MADERA, CA**

17 25. On February 25, 2004, Thomas Graham of Madera County Resource Management
18 Agency made a complaint to the Board that respondent had twice submitted an incorrect
19 "Elevation Certificate" for 26295 Cullen Way, Madera CA.

20 **ELEVENTH CAUSE FOR DISCIPLINE**

21 **(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)**

22 26. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that
23 he was negligent and/or incompetent in his submissions of an Elevation Certificate for 26295
24 Cullen Way, in that it was submitted incorrect twice. The LAG and HAG elevations were
25 incorrect in both submissions.

26 **MONTGOMERY PROPERTY**

27 27. On February 25, 2004, Thomas Graham of Madera County resource Management
28 Agency made a complaint to the Board that respondent had submitted a Record of Survey for

lots 19 and 20, Fairmead Colony, Madera County California (Montgomery property), at least five (5) times, and that the submittals were replete with errors.

TWELFTH CAUSE FOR DISCIPLINE

(Filing of a Record of Survey without having conducted a Survey)

28. Respondent is subject to disciplinary action under section 8762(a) in that his first submittal of the Record of Survey was obviously based on record information, not a survey as required.

THIRTEENTH CAUSE FOR DISCIPLINE

(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)

29. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that he was negligent and/or incompetent in his five (5) submittals of the Record of Survey for the Montgomery Property, in that it required numerous and repeated corrections.

WILLIAMS PROPERTY

30. On February 25, 2004, Thomas Graham of Madera County resource Management Agency made a complaint to the Board that respondent had submitted a Record of Survey for lots 291-294, Fairmead Colony, Madera County California (Williams property), at least twelve (12) times, and that the submittals were replete with errors.

FOURTEENTH CAUSE FOR DISCIPLINE

(Filing of a Record of Survey without having conducted a Survey)

31. Respondent is subject to disciplinary action under section 8762(a) in that this Record of Survey was performed from record data, not a survey as required.

FIFTEENTH CAUSE FOR DISCIPLINE

(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)

32. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that he was negligent and/or incompetent in his twelve (12) submittals of the Record of Survey for the Williams Property, in that it required numerous and repeated corrections, and even after twelve submittals remained below professional standards.

PARCEL MAP "PM 3936"

33. On February 25, 2004, Thomas Graham of Madera County resource Management Agency made a complaint to the Board that respondent had submitted a Parcel Map "PM 3936" for a lot split at Road 6 and Avenue 71/2 , Madera County, CA., at least twelve (12) times, and that the submittals were replete with errors.

SIXTEENTH CAUSE FOR DISCIPLINE

(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)

34. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that he was negligent and/or incompetent in his twelve (12) submittals of PM 3936, in that it required numerous and repeated corrections, and even after twelve submittals remained below professional standards.

JOHNSON COMPLAINT

35. On June 17, 2004 Douglas Johnson made a complaint to the Board that respondent had submitted a Record of Survey to Fresno County for a portion of Lot 6 in the South Fig Avenue Subdivision, Fresno, CA. that contained numerous errors.

SEVENTEENTH CAUSE FOR DISCIPLINE

(Filing of a Record of Survey without having conducted a Survey)

36. Respondent is subject to disciplinary action under section 8762(a) in that this Record of Survey was performed from record data, not a survey as required.

EIGHTEENTH CAUSE FOR DISCIPLINE

(Negligence/Incompetence in the Practice of Civil Engineering/Land Surveying)

37. Respondent is subject to disciplinary action under section 6775(c) and 8780(b) in that he was negligent and/or incompetent in his production and submission of the record of survey for a portion of Lot 6 in the South Fig Avenue Subdivision, Fresno, CA, in that it is incomplete and unsurveyable and is based on record information only.

1 **LOVELY COMPLAINT**

2 38. On March 17, 2006, Stanley Lovely of Peachcrest Development made a complaint to
3 the Board that respondent had breached his contract to provide a subdivision map for the property
4 located at 455 Champion Street, Lemoore, CA. The contract was executed by Sonny Romias
5 below the heading "Engineer" on behalf of Engineering Specialties, and did not identify
6 respondent at all. The contract called for the services to be completed in a total period of 8
7 months, 2 months for the tentative map and 6 months for the final map. Respondent was paid a
8 total of \$7,560.00 and never completed the work or refunded the money.

9 **NINETEENTH CAUSE FOR DISCIPLINE**

10 **(Failure to Properly Execute Written Contract)**

11 39. Respondent is subject to disciplinary action under section 6749 and 8759 in that he
12 failed to personally execute the written contract between Engineering Specialties and Peachcrest
13 as required by law.

14 **TWENTIETH CAUSE FOR DISCIPLINE**

15 **(Fraud Deceit and/or Misrepresentation)**

16 40. Respondent is subject to disciplinary action under sections 6775(b) and 8780(a) in
17 that the contract contained the following misrepresentations:

- 18 a. The contract indicated that Sonny Romias was the "Engineer" when he was not;
19 b. The contract indicated that the project could be completed in timelines which
20 could not be met, and were so unrealistic as to constitute a misrepresentation on the part of
21 respondent and his agent/company.

22 **TWENTY-FIRST CAUSE FOR DISCIPLINE**

23 **(Aiding and Abetting Unlicensed Practice)**

24 41. Respondent is subject to disciplinary action under sections 6775(f) and 8780(f) in that
25 he allowed Sonny Romias to represent himself as, and act as a licensed Engineer/Land Surveyor
26 in the Peachcrest contract when he was and is an unlicensed individual.

1 **TWENTY-SECOND CAUSE FOR DISCIPLINE**

2 **(Breach of Contract)**

3 42. Respondent is subject to disciplinary action under sections 8780(g) and 6775(d) for
4 breach of contract in that his company, engineering Specialties breached the Peachcrest contract
5 by failing to timely produce acceptable subdivision maps as required by the contract.

6 **PRAYER**

7 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
8 and that following the hearing, the Board for Professional Engineers and Land Surveyors issue a
9 decision:

- 10 1. Revoking or suspending Civil Engineer License Number C 23687, issued to Allan Jay
11 Fahri.
- 12 2. Ordering Allan Jay Fahri to pay the Board for Professional Engineers and Land
13 Surveyors the reasonable costs of the investigation and enforcement of this case, pursuant to
14 Business and Professions Code section 125.3;
- 15 3. Ordering Allan Jay Fahri to pay restitution for breach of contract according to proof
16 pursuant to Government Code section 11519;
- 17 3. Taking such other and further action as deemed necessary and proper.
- 18
- 19

20 DATED: 3/17/10

Original Signed

21 **DAVID E. BROWN**
22 Executive Officer
23 Board for Professional Engineers and Land Surveyors
24 Department of Consumer Affairs
25 State of California
26 *Complainant*

27 SA2009102725
28 accusation.rtf